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**From:** Gillam, Rick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=72B51D1F92DE47A292E1418D1A81AD9B-GILLAM, RICK]  
**Sent:** 11/3/2022 2:12:14 PM  
**To:** Johnson, Terry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=37884c5ac1ab48e4b6a8e4248d588f88-Johnson, Terry]; Anderson, Seneca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=730efc3c8c7a4229893ad215f806f83a-Anderson, S]; Lusky, Katy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3863a53f059f4da3b258eb6726520006-Forney, Kathleen]  
**Subject:** RE: EtO emissions estimates?

Thanks for the follow-up Terry!

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**From:** Johnson, Terry <Johnson.Terry@epa.gov>  
**Sent:** Thursday, November 3, 2022 10:11 AM  
**To:** Anderson, Seneca <Anderson.Seneca@epa.gov>; Lusky, Katy <Lusky.Kathleen@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>  
**Subject:** RE: EtO emissions estimates?

Spoke to Jon this morning – he says there are no CBI concerns and he is fine with the table as it is presented. I'm going to go ahead and clear James to release it to the requestor.

-Terry

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**From:** Anderson, Seneca <Anderson.Seneca@epa.gov>  
**Sent:** Wednesday, November 2, 2022 4:23 PM  
**To:** Lusky, Katy <Lusky.Kathleen@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>  
**Subject:** RE: EtO emissions estimates?

I agree with asking Jon if any info is CBI because I do not know if this facility claimed any info as CBI. If he gives the go ahead to share that chart, I might suggest removing the column with tons. The respondent quoted an article that mentioned pounds, so she's already thinking in that unit. I could just imagine if she shared that chart and then someone who didn't know better added those numbers and spread that around.

Seneca

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**From:** Lusky, Katy <Lusky.Kathleen@epa.gov>  
**Sent:** Wednesday, November 2, 2022 1:16 PM  
**To:** Johnson, Terry <Johnson.Terry@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>  
**Cc:** Anderson, Seneca <Anderson.Seneca@epa.gov>  
**Subject:** RE: EtO emissions estimates?

We should check with Jon Witt in OAQPS on whether its releasable in that form. Send the table to him and ask if its ok to share it as a response.

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**From:** Johnson, Terry <Johnson.Terry@epa.gov>  
**Sent:** Wednesday, November 2, 2022 12:24 PM  
**To:** Gillam, Rick <Gillam.Rick@epa.gov>; Lusky, Katy <Lusky.Kathleen@epa.gov>

**Cc:** Anderson, Seneca <[Anderson.Seneca@epa.gov](mailto:Anderson.Seneca@epa.gov)>

**Subject:** RE: EtO emissions estimates?

Thanks – let's see what Seneca thinks. The requestor already knows the back vent emissions from our quote in the Commercial Appeal article, and I believe the stack emissions are available in the NEI, so that should be considered available to the public. That just leaves the other emission categories; since they're all fugitive in nature I just lumped them all together as "other fugitive" rather than break them down by individual process.

Here's what our spokesman said in the Commercial Appeal article:

An EPA spokesperson confirmed to The Commercial Appeal in August that Sterilization Services of Tennessee uses back vents, and that emissions from those vents are indeed uncontrolled.

"We are unsure how much EtO is leaving the back vents, so we used our industry default assumption of 1% EtO use," James Pinkney, a spokesperson for the EPA, said in that August email. "In 2021, EtO use at the facility was 145,528 lbs, so we assume 1,455 lbs is leaving the back vents. The company assumes that 0.03% of EtO use is leaving the back vent (almost two orders of magnitude lower than our assumption), but they did not provide any data supporting this assumption."

Other rooms with vents are also unregulated, according to Pinkney, and the EPA is assuming 0.6% of Sterilization Services of Tennessee's EtO usage is emitted through those vents.

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**From:** Gillam, Rick <[Gillam.Rick@epa.gov](mailto:Gillam.Rick@epa.gov)>

**Sent:** Wednesday, November 2, 2022 12:13 PM

**To:** Johnson, Terry <[Johnson.Terry@epa.gov](mailto:Johnson.Terry@epa.gov)>; Lusky, Katy <[Lusky.Kathleen@epa.gov](mailto:Lusky.Kathleen@epa.gov)>

**Cc:** Anderson, Seneca <[Anderson.Seneca@epa.gov](mailto:Anderson.Seneca@epa.gov)>

**Subject:** RE: EtO emissions estimates?

I'm not sure what level of detail we can release since EPA is still developing the proposed rule. I'm guessing, they may not want to release that much of a detailed breakdown, but I could be totally wrong. Maybe Seneca can answer that. If not, we should probably ask Jon Witt and Matt Woody at OAQPS.

-Rick

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**From:** Johnson, Terry <[Johnson.Terry@epa.gov](mailto:Johnson.Terry@epa.gov)>

**Sent:** Wednesday, November 2, 2022 12:05 PM

**To:** Gillam, Rick <[Gillam.Rick@epa.gov](mailto:Gillam.Rick@epa.gov)>; Lusky, Katy <[Lusky.Kathleen@epa.gov](mailto:Lusky.Kathleen@epa.gov)>

**Cc:** Anderson, Seneca <[Anderson.Seneca@epa.gov](mailto:Anderson.Seneca@epa.gov)>

**Subject:** RE: EtO emissions estimates?

Is any of this emissions breakdown by process considered CBI? I'd like to just give them a simple table like this, but not sure what level of detail we can provide:

Emission Point	Annual Emissions (tons)	Annual Emissions (lbs)
Scrubber Stack	0.0949	190
Oxidizer Stack	0.1129	226
Back Vent	0.7276	1,455

Other Fugitive Emissions	0.4657	931
<b>Total Emissions</b>	<b>1.3811</b>	<b>2,762</b>

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**From:** Gillam, Rick <Gillam.Rick@epa.gov>  
**Sent:** Wednesday, November 2, 2022 11:26 AM  
**To:** Lusky, Katy <Lusky.Kathleen@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>  
**Cc:** Anderson, Seneca <Anderson.Seneca@epa.gov>  
**Subject:** RE: EtO emissions estimates?

Hi Terry,

Using the final emissions information that Matt Woody sent us on 8/1/22, I did a quick calculation of the total emissions from Sterilization Services of Tennessee. SST's emissions were 1.381 TPY (2762 lb/hr). See the calculation in the attached spreadsheet.

Let me know if you need more info.

-Rick

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**From:** Lusky, Katy <Lusky.Kathleen@epa.gov>  
**Sent:** Wednesday, November 2, 2022 11:07 AM  
**To:** Johnson, Terry <Johnson.Terry@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>  
**Cc:** Anderson, Seneca <Anderson.Seneca@epa.gov>  
**Subject:** RE: EtO emissions estimates?

Well you may not need to do that. The modeling done at HQ had estimates of emissions for all sources at the facility, not just the back vents. I will let Rick and copying Seneca as well, to see if they have more to share.

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**From:** Johnson, Terry <Johnson.Terry@epa.gov>  
**Sent:** Wednesday, November 2, 2022 10:41 AM  
**To:** Lusky, Katy <Lusky.Kathleen@epa.gov>; Gillam, Rick <Gillam.Rick@epa.gov>  
**Subject:** FW: EtO emissions estimates?

Katy & Rick,

Can we use the modeling inputs to derive an annual emission rate from various processes at SST in Memphis?

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**From:** Pinkney, James <Pinkney.James@epa.gov>  
**Sent:** Wednesday, November 2, 2022 10:31 AM  
**To:** Lamberth, Larry <Lamberth.Larry@epa.gov>; Newman, Keriema <Newman.Keriema@epa.gov>; Ward, Nacosta <Ward.Nacosta@epa.gov>; Johnson, Terry <Johnson.Terry@epa.gov>  
**Subject:** FW: EtO emissions estimates?

I'm not sure which program would have the requested facility information. See the request below.

James

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**From:** Mikhaila Markham <mikhailamarkham@gmail.com>  
**Sent:** Tuesday, November 1, 2022 4:00 PM

**To:** Pinkney, James <[Pinkney.James@epa.gov](mailto:Pinkney.James@epa.gov)>

**Subject:** EtO emissions estimates?

Hi James,

I've been in contact with Taylor Gillespie regarding EtO emissions in Memphis. I'm wondering if you could provide the estimated total EtO emissions for this facility? I saw [in the Commercial Appeal](#) you provided an estimate of 1,455 lbs emitted from the back vents, but I'd like to know the estimates from all other sources as well.

This is for an illustrated community resource.

Many thanks!

Mikhaila

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[www.mikhailamarkham.com](http://www.mikhailamarkham.com) | she/her